

REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: January 19, 2016

ANALYST: Paul Stoetzer

I. COMMITTEE:

Oakland County Democratic Party

C00040857

Phillip W. Reid, Treasurer (3/5/15 - Present)

Alexander G. Fike, Treasurer (1/29/14 - 3/4/15)

Ryan J. Gesund, Treasurer (12/29/11 - 1/28/14)

24445 Northwestern Hwy, Suite 110

Southfield, MI 48075

II. RELEVANT STATUTE:

52 U.S.C. §30104(b)(4)

11 CFR §104.3 (b)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

Oakland County Democratic Party ("the Committee") amended its 2015 February Monthly, 2015 March Monthly, and 2015 April Monthly Reports to disclose additional disbursements of \$180,866.72, \$355,689.84, and \$225,355.59, respectively, which were not disclosed in the original reports (Attachments 2-4).

2015 February Monthly Report

On February 19, 2015, the Committee filed the original 2015 February Monthly Report covering the period from January 1, 2015 through January 31, 2015. The report disclosed \$84,387.57 in disbursements on Line 21(b) (Other Federal Operating Expenditures) of the Detailed Summary Page (Image 15970271143).

On July 15, 2015, the Committee filed an Amended 2015 February Monthly Report. The report disclosed \$84,399.52 in disbursements on Line 21(b), an increase of \$11.95 in disbursements from the original report (Image 201507159000126486).

On July 16, 2015, the Committee filed an additional Amended 2015 February Monthly Report. The report disclosed \$265,254.29 in disbursements on Line 21(b), an increase of \$180,866.72 in disbursements from the original report (Image 201507169000243191, Attachment 2).

On September 27, 2015, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2015 February Monthly Report, received July 16, 2015. Among other items, the RFAI requested clarification regarding the substantial increase in disbursements disclosed on the Amended 2015 February Monthly Report, which were not disclosed in the original filing (Image 201509270300005317).

On September 28, 2015, the Committee filed a Miscellaneous Electronic Submission ("FEC Form 99") in response to the RFAI. In part, the Committee stated: "Our amended reports show an increase in disbursements over our original report due to bingo disbursements that did not properly transfer from QuickBooks to NGP" (Image 201509289002784108).

On November 2, 2015, the Committee filed an additional FEC Form 99 in response to the RFAI. In part, the Committee stated: "Our amended report shows an increase in disbursements over our original report due to bingo disbursements that did not properly transfer from QuickBooks to NGP. Our amendment properly reported the disbursements" (Image 201511029003260876).

2015 March Monthly Report

On March 19, 2015, the Committee filed the original 2015 March Monthly Report covering the period from February 1, 2015 through February 28, 2015. The report disclosed \$52,671.01 in disbursements on Line 21(b) (Other Federal Operating Expenditures) of the Detailed Summary Page (Image 15950877615).

On July 15, 2015, the Committee filed an Amended 2015 March Monthly Report. The report disclosed no change in disbursements from the original report (Image 201507159000127217).

On July 16, 2015, the Committee filed an additional Amended 2015 March Monthly Report. The report disclosed \$408,360.85 in disbursements on Line 21(b), an increase of \$355,689.84 in disbursements from the original report (Image 201507169000244357, Attachment 3).

On September 30, 2015, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2015 March Monthly Report, received July 16, 2015. Among other items, the RFAI requested clarification regarding the substantial increase in disbursements disclosed on the Amended 2015 March Monthly Report, which were not disclosed in the original filing (Image 201509300300005461).

On November 4, 2015, the Committee filed a Miscellaneous Electronic Submission ("FEC Form 99") in response to the RFAI. In part, the Committee stated:

"Our amended report shows an increase in disbursements over our original report due to bingo disbursements that did not properly transfer from QuickBooks to NGP on our February 2015 report. The amending of the February report necessitated the filing of amended reports for all following months. Our amendment properly reported the disbursements" (Image 201511049003283484).

2015 April Monthly Report

On April 20, 2015, the Committee filed the original 2015 April Monthly Report covering the period from March 1, 2015 through March 31, 2015. The report disclosed \$18,340.78 in disbursements on Line 21(b) (Other Federal Operating Expenditures) of the Detailed Summary Page (Image 15951201847).

On July 15, 2015, the Committee filed an Amended 2015 April Monthly Report. The report disclosed no change in disbursements from the original report (Image 201507159000127808).

On July 16, 2015, the Committee filed an additional Amended 2015 April Monthly Report. The report disclosed \$243,696.37 in disbursements on Line 21(b), an increase of \$225,355.59 in disbursements from the original report (Image 201507169000245231, Attachment 4).

On September 30, 2015, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2015 April Monthly Report, received July 16, 2015. Among other items, the RFAI requested clarification regarding the substantial increase in disbursements disclosed on the Amended 2015 April Monthly Report, which were not disclosed in the original filing (Image 201509300300005465).

On November 2, 2015, the Committee filed a Miscellaneous Electronic Submission ("FEC Form 99") in response to the RFAI. In part, the Committee stated:

"Our amended report shows an increase in disbursements over our original report due to bingo disbursements that did not properly transfer from QuickBooks to NGP on our February 2015 report. The amending of the February report necessitated the filing of amended reports for all following months. Our amendment properly reported the disbursements" (Image 201511029003261268).

On December 8, 2015, the Reports Analysis Division (RAD) Analyst called Phillip Reid, Treasurer of the Committee. Among other issues, the Analyst informed him that the increases in financial activity disclosed on the amended reports would be referred for further action to the Commission and that the Committee could place additional information regarding these increases in activity on the public record if it wished to do so (Attachment 5).

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Cmte. ID: C00040857 Cmte. Name: OAKLAND COUNTY DEMOCRATIC PARTY

Treasurer Name: REID, PHILLIP W. Address: 24445 NORTHWESTERN HWY SUITE 110, SOUTHFIELD, MI 48075

Cmte. Type: Y (QUALIFIED PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER

Form Tp	Rpt Tp	A/I	Receipt Dt	Pgs	Begin Img#	Begin Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			8/4/2015	1	15971189310										
MS-T			8/4/2015	1	15951450908										
MS-T			8/20/2015	1	201508209000890421										
MS-T			8/20/2015	1	201508209000890515										
MS-T			8/20/2015	1	201508209000890689										
MS-T			8/8/2015	1	201509089001621703										
MS-T			9/28/2015	1	201509289002784108										
MS-T			10/8/2015	1	201510089002821851										
MS-T			10/8/2015	1	201510089002821852										
MS-T			11/2/2015	1	201511029003260876										
MS-T			11/2/2015	1	201511029003261268										
MS-T			11/4/2015	1	201511049003283484										
MS-T			11/9/2015	1	201511099003297593										
MS-T			11/10/2015	1	201511109003299000										
MS-T			11/10/2015	1	201511109003299001										
MS-T			11/12/2015	1	201601129004472243										
RQ2	M2	A	9/27/2015	3	201509270300005317	1/1/2015	1/31/2015	9/27/2015							
RQ2	M3	A	9/30/2015	4	201509300300005481	2/1/2015	2/28/2015	9/30/2015							
RQ2	M4	A	9/30/2015	3	201509300300005465	3/1/2015	3/31/2015	9/30/2015							
RQ2	M5	A	10/5/2015	3	201510050300005630	4/1/2015	4/30/2015	10/5/2015							
RQ2	M6	A	10/7/2015	2	201510070300005739	5/1/2015	5/31/2015	10/7/2015							
RQ2	M7	A	10/7/2015	2	201510070300005741	6/1/2015	6/30/2015	10/7/2015							
F3XN	M2	N	2/19/2015	249	15970271140	1/1/2015	1/31/2015		\$174,758	\$192,275	\$85,216	\$281,817			\$0
F3XA	M2	A	7/15/2015	311	201507159000126483	1/1/2015	1/31/2015		\$275,218	\$192,275	\$85,228	\$382,285			\$0
F3XA	M2	A	7/16/2015	573	201507169000243188	1/1/2015	1/31/2015		\$401,368	\$192,275	\$288,083	\$327,560			\$0
F3XN	M3	N	3/19/2015	165	15950877612	2/1/2015	2/28/2015		\$281,817	\$187,908	\$52,671	\$397,054			\$0
F3XA	M3	A	7/15/2015	194	201507159000127214	2/1/2015	2/28/2015		\$382,265	\$187,908	\$52,671	\$497,502			\$0
F3XA	M3	A	7/16/2015	702	201507169000244354	2/1/2015	2/28/2015		\$327,580	\$187,908	\$408,360	\$87,108			\$0
F3XN	M4	N	4/20/2015	202	15951201844	3/1/2015	3/31/2015		\$397,054	\$253,581	\$18,340	\$632,295			\$0
F3XA	M4	A	7/15/2015	219	201507159000127805	3/1/2015	3/31/2015		\$497,502	\$253,581	\$18,340	\$732,743			\$0
F3XA	M4	A	7/16/2015	529	201507169000245228	3/1/2015	3/31/2015		\$87,108	\$253,581	\$243,696	\$96,993			\$0
F3XN	M5	N	5/19/2015	493	15951400019	4/1/2015	4/30/2015		\$632,295	\$256,557	\$211,789	\$877,083			\$0
F3XA	M5	A	7/15/2015	519	201507159000128338	4/1/2015	4/30/2015		\$732,743	\$256,557	\$211,781	\$777,519			\$0
F3XA	M5	A	7/16/2015	518	201507169000255230	4/1/2015	4/30/2015		\$96,993	\$256,557	\$211,781	\$141,789			\$0
F3XA	M5	A	9/8/2015	518	201509089001619018	4/1/2015	4/30/2015		\$96,993	\$256,557	\$247,458	\$106,092			\$0
F3XN	M6	N	6/19/2015	24	15951499435	5/1/2015	5/31/2015		\$877,083	\$1,075	\$17,682	\$660,495			\$0
F3XA	M6	A	7/16/2015	33	201507169000255780	5/1/2015	5/31/2015		\$141,789	\$1,075	\$44,523	\$98,321			\$0
F3XA	M6	A	9/8/2015	33	201509089001621605	5/1/2015	5/31/2015		\$106,092	\$1,075	\$44,523	\$62,644			\$0
F3XN	M7	N	7/16/2015	26	201507169000255850	6/1/2015	6/30/2015		\$98,321	\$355	\$45,030	\$53,645			\$0
F3XA	M7	A	7/22/2015	24	201507229000356140	6/1/2015	6/30/2015		\$98,321	\$355	\$15,457	\$83,219			\$0
F3XA	M7	A	9/8/2015	24	201509089001621643	6/1/2015	6/30/2015		\$62,644	\$355	\$15,457	\$47,541			\$0
F3XN	M8	N	8/15/2015	22	201508159000830340	7/1/2015	7/31/2015		\$83,219	\$425	\$10,328	\$73,315			\$0
F3XA	M8	A	9/8/2015	22	201509089001621681	7/1/2015	7/31/2015		\$47,541	\$425	\$10,328	\$37,638			\$0
F3XN	M9	N	9/15/2015	23	201509159002294936	8/1/2015	8/31/2015		\$37,638	\$260	\$8,361	\$29,536			\$0

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F3XN	M10	N	10/20/2015	784	201510209003212401	9/1/2015	9/30/2015		\$29,536	\$73,739	\$72,927	\$30,348	-	-	\$0
F3XN	M11	N	11/20/2015	1013	201511209003817547	10/1/2015	10/31/2015		\$30,348	\$94,908	\$95,903	\$29,352	-	-	\$0
F3XN	M12	N	12/21/2015	747	201512219004407081	11/1/2015	11/30/2015		\$26,768	\$112,275	\$106,724	\$32,318	-	-	\$0
F1A	A		3/5/2015	5	15950841448										
F1A	A		3/5/2015	5	15950841618										
Totals										\$1,153,360	\$1,519,825				

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Oakland County Democratic Party (C00040857)

2015 February Monthly Report / Amended 2015 February Monthly Report

Overview of Additional Disbursements:

Report Line	2015 February Monthly Report (Image 15970271143)	Amended 2015 February Monthly Report, received 7/16/15 (Image 201507169000243191)	Disbursement Variance Amount
Line 21(b): Other Federal Operating Expenditures	\$84,387.57	\$265,254.29	\$180,866.72
Total	\$84,387.57	\$265,254.29	\$180,866.72

Oakland County Democratic Party (C00040857)
2015 March Monthly Report / Amended 2015 March Monthly Report

Overview of Additional Disbursements:

Report Line	2015 March Monthly Report (Image 15950877615)	Amended 2015 March Monthly Report, received 7/16/15 (Image 201507169000244357)	Disbursement Variance Amount
Line 21(b): Other Federal Operating Expenditures	\$52,671.01	\$408,360.85	\$355,689.84
Total	\$52,671.01	\$408,360.85	\$355,689.84

Oakland County Democratic Party (C00040857)
2015 April Monthly Report / Amended 2015 April Monthly Report

Overview of Additional Disbursements:

Report Line	2015 April Monthly Report (Image 15951201847)	Amended 2015 April Monthly Report, received 7/16/15 (Image 201507169000245231)	Disbursement Variance Amount
Line 21(b): Other Federal Operating Expenditures	\$18,340.78	\$243,696.37	\$225,355.59
Total	\$18,340.78	\$243,696.37	\$225,355.59